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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
Debtors.	:	
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ERRATA PAGE FOR EXPEDITED MOTION FOR ORDER
UNDER 11 U.S.C. §§ 363, 1107, AND 1108 AUTHORIZING DELPHI
AUTOMOTIVE SYSTEMS (HOLDING), INC. TO PROVIDE FUNDS TO
DELPHI AUTOMOTIVE SYSTEMS ESPANA S.L. (DOCKET NO. 8501)
("DASE FUNDING MOTION ERRATA PAGE")

PLEASE TAKE NOTICE THAT attached hereto is the corrected page 7 of the
above-referenced motion.

Dated: New York, New York
July 16, 2007

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP

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13. On March 20, 2007, DASE filed a "Concurso" application for a Spanish insolvency proceeding. On April 13, 2007, the Spanish court declared DASE to be in voluntary Concurso and appointed Enrique Bujidos, Adalberto Canadas Castillo, and, thereafter, Fernando Gómez Martín as receivers of DASE (the "DASE Receivers"). The Concurso provides DASE support by managing the process of resolving claims related to the operation of the Cadiz Plant in accordance with applicable Spanish law, with oversight of the Spanish court and the DASE Receivers. The role of the DASE Receivers is to, among other things, (i) address the legal interests of employees, suppliers, and any other parties affected by the closure of the Cadiz Plant, (ii) prepare a report for the Spanish court setting forth the assets and liabilities, including claims, of DASE, (iii) supervise and approve expenditures of funds by DASE during Concurso, and (iv) provide consultation and support for DASE's plan of reorganization in Concurso, including the terms relating to the Separation Plan (as defined below).

14. Under Spanish law, Delphi must provide employees affected by the closure of the Cadiz Plant with a separation allowance. The minimum separation payment under Spanish law is 20 days of salary per year of service, but the Cadiz workers councils, assemblies, and the unions representing the affected employees (the "Cadiz Unions") assert that Spanish automotive industry standard is approximately 45 to 60 days of salary per year of service, which would cost DASE between €~~115~~123 and €~~155~~164 million (approximately \$~~156~~167 and \$~~211~~223 million⁹). In late 2005, DASE entered into a labor agreement which provided for 60-day severance packages for some employees and continued jobs for the remaining 1,600 employees through the end of 2010 (the "2005 Industrial Plan"). Were the 2005 Industrial Plan to be enforced, the cost of continuing

⁹ The currency conversion of 1.3601 dollars/euros used herein is for explanatory purposes only and is based on the key currency cross rates quoted by Reuters at 4:00 p.m. Eastern Daylight Time on July 5, 2007, as published in the Wall Street Journal on July 6, 2007.